

Responses of RNK, Inc. d/b/a RNK Telecom (“RNK”)

333 Elm St. Suite 310

Dedham MA 02026

Joint Parties’ First Set of Discovery Requests To CTC

Communications Corp. and RNK, Inc. d/b/a RNK Telecom

issued December 24, 2003

Page 1 of 18

Docket No. 03-60

January 6, 2004

JOINT PARTIES-1: Please state whether you are either an incumbent local exchange provider (“ILEC”) providing telecommunications service in the Massachusetts or an affiliate of such an ILEC. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. §153(1)

Respondent for RNK:

Douglas S. Denny-Brown

Response:

RNK is neither an ILEC in the Commonwealth of Massachusetts, nor is RNK an affiliate of an ILEC, as described in the question.

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Joint Parties’ First Set of Discovery Requests To CTC

Communications Corp. and RNK, Inc. d/b/a RNK Telecom

issued December 24, 2003

Page 2 of 18

Docket No. 03-60

January 6, 2004

JOINT PARTIES-2: Please state whether you are either a competitive local exchange carrier (“CLEC”) providing telecommunications service in Massachusetts or an affiliate of such a CLEC. If you are an affiliate of an CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

Respondent for RNK:

Douglas S. Denny-Brown

Response:

RNK is a CLEC providing telecommunications services in Massachusetts. However, RNK is *not* affiliated with any other such CLEC.

Responses of RNK, Inc. d/b/a RNK Telecom (“RNK”)
333 Elm St. Suite 310
Dedham MA 02026
*Joint Parties’ First Set of Discovery Requests To CTC
Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 3 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-3: Do you lease analog voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a T1 circuit or a DS1 or above circuit.)

Respondent for RNK:

Christopher V. Reeping

Response:

**RNK’S RESPONSE TO THIS ITEM IS CONFIDENTIAL AND PROPRIETARY AND
HAS BEEN REDACTED FOR THIS PUBLIC VERSION.**

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 4 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-4: Do you use non-ILEC switches to provide local exchange service to Massachusetts customers via analog voice-grade loops? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.)

Respondent for RNK:

Christopher V. Reeping

Response:

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*Joint Parties’ First Set of Discovery Requests To CTC
Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 5 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-6: Please provide the following general information regarding any local exchange service that you currently offer to customers in Massachusetts using analog voice grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits).

a. Do you currently provide local exchange service to residential customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].

b. Do you currently provide local exchange service to business customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.

c. Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using analog voice grade, non T-1 loops.

Respondent for RNK:

Christopher V. Reeping

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 6 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-7: If you offer cable telephony service in Massachusetts, please state:

- a. To what percent of your cable telephony customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the typical or average retail price for this service?**
- b. To what percent of your cable telephony customers do you provide local exchange service and broadband service but not cable television service? What is the typical or average retail price for this service?**
- c. To what percent of your cable telephony customers do you provide local exchange service and cable television service but not broadband service? What is the typical or average price for this service?**
- d. To what percent of your cable telephony customers do you provide local exchange service, cable television service, and broadband service? What is the typical or average price for this service?**

Respondent for RNK:

Douglas S. Denny-Brown

Response:

RNK does not, at this time, provide cable telephony service anywhere in the Commonwealth of Massachusetts.

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*Joint Parties’ First Set of Discovery Requests To CTC
Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 7 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-8: If you are a CLEC offering circuit-switched local exchange service in Massachusetts, for each month or quarter over the most recent 12-month period for which data is available, please provide the following for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis:

a. The number of newly installed business lines served by unbundled analog voice grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);

- i. Number or percentage of such lines that were migrated from the ILEC’s retail service.**
- ii. Number or percentage of such lines that were migrated from a CLEC’s retail service.**

b. The number of newly installed business lines served by UNE-P;

- i. Number or percentage of such lines that were migrated from the ILEC’s retail service.**
- ii. Number or percentage of such lines that were migrated from a CLEC’s retail service.**

c. The number of newly installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);

- i. Number or percentage of such lines that were migrated from the ILEC’s retail service.**
- ii. Number or percentage of such lines that were migrated from a CLEC’s retail service.**

d. The number of newly installed residential lines served by UNE-P.

- i. Number or percentage of such lines that were migrated from the ILEC’s retail service.**
- ii. Number or percentage of such lines that were migrated from a CLEC’s retail service.**

For lines migrated from a CLEC’s retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism. If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

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*Joint Parties’ First Set of Discovery Requests To CTC
Communications Corp. and RNK, Inc. d/b/a RNK Telecom*
issued December 24, 2003

Page 8 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-8: (cont’d.)

Respondent for RNK:

Christopher V. Reeping

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 9 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-9: Please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

- a. Installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches
- b. Installed business lines served by UNE-P;
- c. Installed business lines served by non-circuit switches;
- d. Installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches
- e. Installed residential lines served by UNE-P;
- f. Installed residential lines served by non-circuit switches.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

Respondent for RNK:

Christopher V. Reeping

Response:

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*Joint Parties’ First Set of Discovery Requests To CTC
Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 10 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-10: For each switch your company operates in Massachusetts, please provide the information requested in *[tables omitted]*. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

Respondent for RNK:

Neal Hart

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 11 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-11: For each switch that your company operates in Massachusetts other than circuit switches, please provide the following:
a. the date(s) on which you installed the switch and began providing local exchange service on the switch;
b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

Respondent for RNK:

Neal Hart

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom

issued December 24, 2003

Page 12 of 18

Docket No. 03-60

January 6, 2004

JOINT PARTIES-12: Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products to particular customer segments, either by geography, class of customer, number of lines purchased, or otherwise? If so, please describe the service offering and explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

Respondent for RNK:

Matthew T. Kinney

Response:

No, RNK’s intrastate tariffs certainly do not limit by geography, class of customer, number of lines, and not otherwise within my current recollection.

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 13 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-13: Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flowthrough basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating “Yes” or “No” in each box.

Respondent for RNK:

Christopher V. Reeping

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 14 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-14: Please explain whether you have always been able to obtain a customer service record (“CSR”) from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

Respondent for RNK:

Christopher V. Reeping

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 15 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-15: Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices,etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Respondent for RNK:

Christopher V. Reeping

Response:

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*Joint Parties’ First Set of Discovery Requests To CTC
Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 16 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-16: Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Respondent for RNK:

Christopher V. Reeping

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 17 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-17: Please explain whether you currently have in place and use electronic automated systems to:

- a. Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c. Maintain and repair service for customers whose service is provisioned using your own switches.
- d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- e. Conduct testing for customer services provisioned via your own switches using UNE loops.
- f. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

Respondent for RNK:

Christopher V. Reeping

Response:

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Communications Corp. and RNK, Inc. d/b/a RNK Telecom
issued December 24, 2003*

Page 18 of 18
Docket No. 03-60
January 6, 2004

JOINT PARTIES-18: Please state:

a. Whether your company has ever applied for Eligible Telecommunications Carrier (“ETC”) status in Massachusetts.

b. If there answer to (a) is yes, please state whether ETC status was granted, the DTE case number in which it was granted, and the date of the order approving the status.

Respondent for RNK:

Douglas S. Denny-Brown

Response:

(a) RNK has not applied for Eligible Telecommunications Carrier (“ETC”) status in Massachusetts.

(b) Since the answer to (a) is no, this question is not applicable to RNK.